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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMANDA HOUGHTON, CHARLES
DOUGLAS, and SUSAN FRANKLIN, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

COMPOUND DAO, a California general
partnership; ROBERT LESHNER;
GEOFFREY HAYES; AH CAPITAL
MANAGEMENT, LLC; POLYCHAIN
ALCHEMY, LLC; BAIN CAPITAL,
VENTURES (GP), LLC; GAUNTLET
NETWORKS, INC; PARADIGM
OPERATIONS LP,

Defendants.

Case No. 3:22-cv-7781-WHO

Hon. William H. Orrick

**DECLARATION OF JASON
HARROW IN SUPPORT OF
MOTION TO APPOINT AMANDA
HOUGHTON, CHARLES
DOUGLAS, AND SUSAN
FRANKLIN AS LEAD COUNSEL
AND TO APPROVE LEAD
COUNSEL**

**Date: February 6, 2023
Hearing Date: March 8, 2023
2:00 pm, Courtroom 2**

DECLARATION OF JASON HARROW

I, Jason Harrow, declare as follows.

1. I am a partner at Gerstein Harrow LLP and counsel for the Plaintiffs in this action. I am over eighteen years of age. If called to testify about these matters, I could do so competently.

2. Upon the filing of the Complaint in this case, my colleagues and I caused to be published in *Business Wire* a notice of this action that announced the pendency of this action, the claims asserted, the purported class period, and the lead plaintiff deadline.

3. After an incorrect version of the notice was published on December 8, 2022, *Business Wire* issued a corrected release on December 9, 2022 that meets the requirements listed above.

4. On February 3, 2023, I visited the URL <https://www.businesswire.com/news/home/20221209005494/en/CORRECTING-and-REPLACING-Gerstein-Harrow-and-Fairmark-Partners-Announce-Securities-Class-Action>, which is the permanent web address of the announcement published on December 9, 2022. I confirmed it is a copy of the notice published on December 9, 2022. A true and correct copy of the notice, showing the date and time of publication as December 9, 2022 at 2:01 pm eastern time, is attached as Exhibit A.

I declare under penalty of perjury according to the laws of the United States of America that the foregoing is true and correct. Executed on February 3, 2023.

/s/ Jason Harrow

Exhibit A



CORRECTING and REPLACING Gerstein Harrow and Fairmark Partners Announce Securities Class Action

CORRECTION...by Gerstein Harrow LLP and Fairmark Partners LLP

December 09, 2022 02:01 PM Eastern Standard Time

SAN FRANCISCO--(BUSINESS WIRE)--Please replace the release with the following corrected version due to multiple revisions.

The updated release reads:

GERSTEIN HARROW AND FAIRMARK PARTNERS ANNOUNCE SECURITIES CLASS ACTION

Gerstein Harrow LLP and Fairmark Partners LLP announce that a securities class action, captioned *Houghton v. Compound DAO, et al.*, No. 22-CV-7781 (N.D. Cal.) is pending against Compound DAO, a California general partnership, and its partners, Robert Leshner, Geoffrey Hayes, AH Capital Management LLC, Polychain Alchemy LLC, Bain Capital LLC, Gauntlet Networks Inc., and Paradigm Operations, LP. The case is pending in the United States District Court for the Northern District of California.

The Action asserts claims under the Securities Act of 1933 and California securities laws on behalf of a putative class of persons who purchased COMP tokens on or after December 8, 2021. The Action seeks rescission and damages. The Action alleges that Compound DAO offered and sold COMP, a digital token that is an unregistered security.

If you purchased COMP since December 8, 2021, either by using the Compound protocol, purchasing COMP on a decentralized exchange, or purchasing COMP on a centralized exchange, you are a member of the proposed class. A lead plaintiff is a court-appointed representative for members of a class. Lead plaintiff motion papers must be filed with the U.S. District Court for the Northern District of California no later than 60 days after the date on which this notice is published. Should the Court certify a class in the Action, your ability to share in any potential recovery is not dependent upon you serving as lead plaintiff.

A class has not yet been certified in this Action. You are not represented by counsel unless you retain a lawyer. You may retain counsel of your choice.

Contacts

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